

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Mattie Mae Faulkner,

Debtor

MATTIE MAE FAULKNER,

Plaintiff

v.

M &T BANK,

Defendant

CHAPTER 13

Bankruptcy No. 17-10660-ELF

Adversary No. 17-00276-elf

**STIPULATION TO EXTEND TIME FOR FILING RESPONSE TO DEFENDANTS
MOTION TO DISMISS AND TO RESCHEDULE HEARING**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. On NOVEMBER 14, 2017 Defendant M&T Bank filed an amended motion to dismiss the above captioned adversary action filed by Debtor against it.
2. The notice of motion did not contain any proposed hearing date for consideration of the motion.
3. Debtor's counsel has been in San Francisco since November 21, 2017 in anticipation of and for the birth of his first grandchild, who was born December 3, 2017.
4. Debtor's counsel anticipates returning to his office on or about December 14, 2017;
5. The parties have agreed to extend the time for Debtor to respond to Defendant's Motion to Dismiss to January 2, 2018.
6. The parties further agree that any hearing on the motion to dismiss not be scheduled for before January 15, 2018.

Date: December 6, 2017

By: /s/Thomas I. Puleo, Esquire
Thomas I. Puleo, Esquire
Attorney for Defendant, M & T Bank

Date: December 6, 2017

/s/ Irwin Trauss
Irwin Trauss, Esquire
Attorney for Plaintiff/Debtor, Mattie Mae Faulkner

Approved by the Court this _____ day of _____, 2017.

Eric L. Frank
United States Bankruptcy Judge